

EXCEPTION

EXCEPTION 44

BellSouth Florida OSS Testing Evaluation

Date: April 04, 2001

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Carrier Functional Bill Evaluation (TVV11).

Exception:

BellSouth issued CABS bills which reflect incorrect quantities for Unbundled Switching and Transport usage.

Background:

In the course of executing the Functional Usage Evaluation (TVV11), KPMG Consulting completed a variety of test calls including calls on unbundled lines during the period between December 11-14, 2000. KPMG Consulting examined the corresponding December and January CABS bills and observed inconsistencies between the expected and actual results. The expected results were calculated using the Daily Usage Feed (DUF) records sent by Bellsouth-Florida.

Issue:

Bellsouth rendered bills to the KPMG Consulting CLEC with incorrect quantities of Unbundled Transport Shared Transport Access Tandem Originating minutes. Inconsistencies were observed in each of the following rate categories:

1. Unbundled transport shared transport
2. Unbundled transport facilities termination end-office (EO) to end-office
3. Unbundled transport facilities termination EO to Tandem
4. Unbundled transport facilities termination TOPS to EO
5. Unbundled transport tandem switching
6. Unbundled local switching – switching functionality

Category 1: Unbundled Transport Shared Transport

Inconsistencies in this category consisted of differences in the distribution of minutes across several mileage distances. Additionally, there were differences in the distances expected, based on KPMG Consulting calculations, and those actually reflected on the bills.

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Categories 2 to 6

Inconsistencies in these categories consisted of differences in the expected number of minutes, as calculated by KPMG Consulting, and those reflected on the bill.

The following table provides examples of the discrepancies found in the different rate categories:

Rate Category	Q-Account/CLLI	561 Q85-5134 134 WPBHFLANDS0		904 Q85-5134 134 JCVLFLCLDS0		305 Q85-5134 134 MIAMFLOL68E	
		Expected	actual	Expected	actual	Expected	actual
local originating		1116	38	42	35	298	214
tandem originating		192	92	167	16	84	23
access tandem originating		n/a	n/a	n/a	n/a	233	12
access tandem terminating		n/a	n/a	n/a	n/a	11	1
Unbundled transport shared trans		1308	130	209	51	626	250
local originating		1116	38	42	32	297	210
tandem originating		155	208	141	184	47	61
Unbundled trans facilities term EO-EO		1271	246	183	216	344	271
local tandem originating		17	16	10	10	6	15
access tandem originating		n/a	n/a	6	6	12	12
access tandem terminating		n/a	n/a	0	77	0	1
Unbundled trans facilities term EO-Tandem		17	16	16	93	18	28
local tandem originating		24	42	18	58	32	29
Unbundled trans facilities term TOPS-EO		24	42	18	58	32	29
local originating		1116	38	42	32	297	210
tandem originating		201	224	167	194	84	76
access tandem originating		n/a	n/a	6	6	12	12
access tandem terminating		n/a	n/a	0	77	0	1
Unbundled trans tandem switching		1317	262	215	309	393	299
local originating intraswitch		3724	3708	3202	3138	3627	3619
local originating interswitch		244	262	166	230	79	285
TEO interswitch		1206	288	163	274	379	201
access originating interswitch		175	180	202	524	233	234



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Q-Account/CLI	561 Q85-5134 134 WPBHFLANDS0		904 Q85-5134 134 JCVLFLCLDS0		305 Q85-5134 134 MIAMFLOL68E	
	Expected	actual	Expected	actual	Expected	actual
terminating interswitch	3	90	0	149	11	82
Unbundled local switching	5352	4528	3569	4316	4329	4521

Impact:

A CLEC's ability to accurately project revenue and operating expenses is based, in part, on accurate billings from the ILEC. Incorrect billing can distort financial planning. In addition, incorrect charges on CLEC bills may cause a CLEC to incur added costs to reconcile bills and pursue bill corrections.

Ex 44 KPMG Clarification Questions

1. 'Billing To' Issue

Question: Should KPMG use the 'Billed To Number' in the DUF record to determine on which UNE bill the usage for the calls will be reflected.

Answer: No. This number is for the CLEC to use to determine how to bill the end user. It has no relationship to BellSouth's billing to the CLEC. The 'From Number' (for originating records) and the 'To Number' (for terminating records) should be used to drive usage to the UNE bills.

Question: How is the resale indicator of 6 or UNE indicator of 7 set?

Answer: The resale indicator of 6 is set on the DUF record if the call is non-UNE originating or BST originating and it is billing to a resale number. The UNE indicator of 7 is set if it is UNE originating or an access UNE terminating record.

Additional Information Request: Provide the billing account number of the calls denoted on KPMG call detail as OCN (billing on a different OCN) or Acct (billing on a different account).

Response: The correct billing account numbers are noted by the individual calls on the attached spreadsheets. BellSouth has verified that all KPMG test calls are billing on the correct account.

Documentation for this issue can be found on the Web at
www.interconnection.bellsouth.com/products/billing/ADUF.pdf or
www.interconnection.bellsouth.com/products/billing/ODUF.pdf

2. Directory Assistance Billing

Question: How should DUF records associated with Directory Assistance (DA) be billed? What call flows should be used? Should all DUF records associated with DA calls drive to usage rate elements?

Answer: The appropriate call flows and categories of charges are shown below:

Directory Assistance – 1 UNE DUF Record

DUF Record	Type Record	KPMG Expected Call Flow	Correct Call Flow	Correct Billing Categories
10-01-32	DA 'Hit' Charge	D1	D1 or D2 series depending on CLEC contract	Switching Rate elements and DA 'Hit' Charge

Directory Assistance Call Completion – Multiple UNE DUF Records: 1 End To End Call Event

DUF Record	Type Record	KPMG Expected Call Flow	Correct Call Flow	Correct Billing Categories
10-01-32	DA 'Hit' Charge	D3	D3 or D4 series depending on CLEC contract and the 'To Number'.	Hit Charges only – no switching rate elements – the companion local or toll record is used to bill the switching rate elements.
10-00-18	Call Completion	D3	D3 or D4 series depending on CLEC contract and the 'To Number'	DA Call Completion
10-00-31(local) or 10-10-01 (toll)	Usage	05	D3 or D4 series depending on CLEC contract and the 'To Number'.	Switched rate elements only

Note: From end to end, the call event will only bill based on one call flow. It is not correct to bill the same switched rate elements more than one time for the same call. Call Flow information is documented on the Web at <http://www.interconnection.bellsouth.com/guides/unedocs/2wireVGrdULPSCombVer6.pdf>

3. Call Flow 15A

Question: Is there anything in the DUF record to allow KPMG to determine that Call Flow 15A should be used and that mileage should be to the ICO?

Answer: For the particular call under question, KPMG called an end user in ICO territory. Therefore, a call flow appropriate to this situation should apply. There are several call flows that address ICO calling scenarios.

Call Flow information is documented on the Web at

<http://www.interconnection.bellsouth.com/guides/unedocs/2wireVGrdULPSCombVer6.pdf>

4. Local Routing Number

Question: Is there a way for KPMG to get LRN (Local Routing Number) to use to compute mileage?

Answer: For ODUF, when calls are placed to ported telephone numbers, the appropriate module is used as documented in the EMI guidelines. For ADUF, the LRN field is populated in the DUF record as documented in the EMI guidelines.

The ordering form for the EMI document is on the ATIS website at

<http://www.atis.org/atis/clc/obf/obfdocs.htm>

5. Calls outside the Test Dates not Expected by KPMG

Question: Provide calls outside the test dates that are on BellSouth bills but not included on expected results.

Answer: These calls are added to the attached spreadsheets for the appropriate end office.

6. TOPS Mileage

Question: Can KPMG know which TOPS office serves an NXX?

Answer: There is no industry standard to provide this info to a CLEC.

Other Issues:

7. Credit Requests:

Credit request calls are not billed to the CLEC. The original call is billed since the BellSouth network is used.

8. Ports

Port charges should be billed based on the appropriate call flow.

9. Disconnect/ New Connect -- Disconnect and New Connect on the same day.

Usage on the date of the disconnect is associated with the disconnected account, not the new account.

10. Direct vs. Tandem

A call will never be billed as both direct and tandem routed.

11. Errored Calls

BellSouth found that 12 calls errored due to a program problem and did not bill.

12. 611 Calls to the BellSouth Repair Center

BellSouth found that calls to BellSouth repair were not being billed as shown in the documented call flows. This documentation will be updated. These calls should bill based on call flow 52. Call Flow information is documented on the Web at

<http://www.interconnection.bellsouth.com/guides/unedocs/2wireVGrdULPSCombVer6.pdf>

Date: August 6, 2001

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Functional Carrier Bill Evaluation (TVV11).

Exception:

BellSouth issued CABS bills which reflect incorrect quantities for Unbundled Switching and Transport usage. (TVV11)

Background:

In the course of executing the Functional Usage Evaluation (TVV11), KPMG Consulting completed a variety of test calls including calls on unbundled lines during the period between December 11-14, 2000. KPMG Consulting examined the corresponding December and January CABS bills and observed inconsistencies between the expected and actual results. The expected results were calculated using the Daily Usage Feed (DUF) records sent by Bellsouth-Florida.

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Categories 2 to 6

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The following table provides examples of the discrepancies found in the different rate categories:

Q-Account/CLLI	561 Q85-5134 134 WPBHFLANDS0		904 Q85-5134 134 JCVLFLCLDS0		305 Q85-5134 134 MIAMFLOL68E	
	Expected	actual	Expected	actual	Expected	actual
Rate Category						
local originating	1116	38	42	35	298	214
tandem originating	192	92	167	16	84	23
access tandem originating	n/a	n/a	n/a	n/a	233	12
access tandem terminating	n/a	n/a	n/a	n/a	11	1
Unbundled transport shared trans	1308	130	209	51	626	250
local originating	1116	38	42	32	297	210
tandem originating	155	208	141	184	47	61
Unbundled trans facilities term EO-EO	1271	246	183	216	344	271
local tandem originating	17	16	10	10	6	15
access tandem originating	n/a	n/a	6	6	12	12
access tandem terminating	n/a	n/a	0	77	0	1
Unbundled trans facilities term EO-Tandem	17	16	16	93	18	28
local tandem originating	24	42	18	58	32	29
Unbundled trans facilities term TOPS-EO	24	42	18	58	32	29
local originating	1116	38	42	32	297	210
tandem originating	201	224	167	194	84	76
access tandem originating	n/a	n/a	6	6	12	12
access tandem terminating	n/a	n/a	0	77	0	1
Unbundled trans tandem switching	1317	262	215	309	393	299
local originating intraswitch	3724	3708	3202	3138	3627	3619
local originating interswitch	244	262	166	230	79	285
TEO interswitch	1206	288	163	274	379	201
access originating interswitch	175	180	202	524	233	234
terminating interswitch	3	90	0	149	11	82

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Q-Account/CLLI	561 Q85-5134 134 WPBHFLANDS0		904 Q85-5134 134 JCVLFLCLDS0		305 Q85-5134 134 MIAMFLOL68E	
	Expected	actual	Expected	actual	Expected	actual
Unbundled local switching	5352	4528	3569	4316	4329	4521

Amendment:

Bellsouth's response to Exception 44 identified the following four scenarios that contributed to the differences between the expected and actual number of minutes of use cited above:

1. Custom Local Area Signaling Services, such as Touch Star services, are not billable records for UNE usage rate elements as defined by BellSouth. However, DUF records are sent to the CLEC for their billing purposes.
2. Intralata toll calls LPIC'd to BellSouth were originally considered un-billable. A mechanical billing method for applying UNE usage to BellSouth carried Intralata toll messages will be implemented May 25, 2001. DUF records are sent to the CLEC for their billing purposes, however.
3. Usage sensitive calls, such as 3-way calling, are not billable records for UNE usage rate elements as defined by BellSouth. However, DUF records are sent to the CLEC for their billing purposes.
4. Alternately billed non-UNE originated or terminated calls, such as third number and credit card calls, are not billable records for UNE usage rate elements as defined by BellSouth. However, DUF records are sent to the CLEC for their billing purposes.

KPMG Consulting conducted a DUF retest between May 29th and June 1st, 2001. Inconsistencies were observed in each of the following rate categories:

1. Unbundled transport shared transport
2. Unbundled transport facilities termination end-office (EO) to end-office
3. Unbundled transport facilities termination EO to Tandem
4. Unbundled transport facilities termination TOPS to EO
5. Unbundled transport tandem switching – FL to EC
6. Unbundled transport tandem switching – Trunk Port
7. Unbundled local switching – switching functionality
8. Unbundled local switching – Trunk Port

Category 1

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Inconsistencies were observed in the mileages reported, as well as the distribution of minutes across several mileage distances. A summary of the differences is provided in the table below: (The detail is included as Attachment A).

		Mileage Bands	
		Expected	Actual
305 Q85-5134 134 MIAMFLOL68E	Local	5, 11, 17, 51, 56, 58	10
	Tandem	11	--
305 Q59-0568 568 MIAMFLOL68E	Local	5, 9, 17, 51, 56	56
	Tandem	--	5, 10
305 Q97-2336 336 MIAMFLOL68E	Local	5, 9, 10, 11, 14, 51, 56, 58	--
	Tandem	5, 9, 10, 11, 14, 58	--
904 Q85-5134 134 PNSCFLBLDS0	Local	4, 37, 44	7
	Tandem	4, 7, 21	4, 7, 21

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Categories 2 to 8

Rate Category	Q-Account/CLLI	561 Q59-0568 568 WPBHFLANDS0				561 Q85-5134 134 WPBHFLANDS0			
		expected	actual	difference	% diff	expected	actual	difference	% diff
Unbundled transport shared trans		39	50	11	28.21%	117	58	-59	-50.43%
Unbundled trans facilities term EO-EO		49	50	1	2.04%	76	81	5	6.58%
Unbundled trans facilities term EO-Tandem		9	10	1	11.11%	12	15	3	25.00%
Unbundled trans facilities term TOPS-EO		5	9	4	80.00%	23	17	-6	-26.09%
Unbundled trans tandem switch. FL-EO		62	60	-2	-3.23%	110	96	-14	-12.73%
Unbundled trans. tan. switch. Trunk Port		124	118	-6	-4.84%	220	193	-27	-12.27%
Unbundled local switching - Switch. Func		199	209	10	5.03%	351	315	-36	-10.26%
Unbundled local switching - Trunk Port		94	118	24	25.53%	124	194	70	56.45%

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Rate Category	561 Q85-5134 134 FTLDFLMRDSO				305 Q59-0568 568 MIAMFLOL68E			
	expected	actual	difference	% diff	expected	actual	difference	% diff
Unbundled transport shared trans	31	31	0	0.00%	42	22	-20	-47.62%
Unbundled trans facilities term EO-EO	25	58	33	132.00%	27	26	-1	-3.70%
Unbundled trans facilities term EO-Tandem	5	4	-1	-20.00%	5	7	2	40.00%
Unbundled trans facilities term TOPS-EO	6	6	0	0.00%	9	6	-3	-33.33%
Unbundled trans tandem switch. FL-EC	36	61	25	69.44%	40	34	-6	-15.00%
Unbundled trans. tan. switch. Trunk Port	69	124	55	79.71%	75	68	-7	-9.33%
Unbundled local switching - Switch. Func	156	211	55	35.26%	181	173	-8	-4.42%
Unbundled local switching - Trunk Port	65	124	59	90.77%	35	66	31	88.57%

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Rate Category	305 Q85-5134 134 MIAMFLOL68E				305 Q97-2336 336 MIAMFLOL68E			
	expected	actual	difference	% diff	expected	actual	difference	% diff
Unbundled transport shared trans	625	2	-623	-99.68%	131	0	-131	-100.00%
Unbundled trans facilities term EO-EO	102	2	-100	-98.04%	79	0	-79	-100.00%
Unbundled trans facilities term EO-Tandem	505	0	-505	-100.00%	11	0	-11	-100.00%
Unbundled trans facilities term TOPS-EO	13	0	-13	-100.00%	28	0	-28	-100.00%
Unbundled trans tandem switch FL-EO	102	2	-100	-98.04%	175	57	-118	-67.43%
Unbundled trans. tan. switch. Trunk Port	204	4	-200	-98.04%	250	122	-128	-51.20%
Unbundled local switching - Switch. Func	764	58	-706	-92.41%	724	588	-136	-18.78%
Unbundled local switching - Trunk Port	39	4	-35	-89.74%	247	121	-126	-51.01%

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Rate Category	904 Q85-5134 134 P NSCFLBLDS0				904 Q85-5134 134 ORLDFLSADSO			
	expected	actual	difference		expected	actual	difference	
Unbundled transport shared trans	56	78	22	39.29%	36	0	-36	-100.00%
Unbundled trans facilities term EO-EO	98	100	2	2.04%	0	0	0	0.00%
Unbundled trans facilities term EO-Tandem	25	22	-3	-12.00%	36	0	-36	-100.00%
Unbundled trans facilities term TOPS-EO	0	0	0	0.00%	0	0	0	0.00%
Unbundled trans tandem switch. FL-EC	127	121	-6	-4.72%	36	0	-36	-100.00%
Unbundled trans. tan. switch. Trunk Port	220	221	1	0.45%	72	0	-72	-100.00%
Unbundled local switching - Switch. Func	434	500	66	15.21%	39	39	0	0.00%
Unbundled local switching - Trunk Port	98	220	122	124.49%	39	0	-39	-100.00%

Impact:

A CLEC's ability to accurately project revenue and operating expenses is based, in part, on accurate billings from the ILEC. Incorrect billing can distort financial planning. In addition, incorrect charges on CLEC bills may cause a CLEC to incur added costs to reconcile bills and pursue bill corrections.

Date: October 10, 2001

EXCEPTION REPORT

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Categories 2 to 6

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tandem originating	201	224	167	194	84	76
access tandem originating	n/a	n/a	6	6	12	12
access tandem terminating	n/a	n/a	0	77	0	1
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	Expected	Actual	Expected	Actual	Expected	Actual
local originating interswitch	244	262	166	230	79	285
TEO interswitch	1206	288	163	274	379	201
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7. Unbundled local switching – switching functionality

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Category 1

Inconsistencies were observed in the mileages reported, as well as the distribution of minutes across several mileage distances. A summary of the differences is provided in the table below: (The detail is included as Attachment A).

		Mileage Bands	
		Expected	Actual
305 Q85-5134 134 MIAMFLOL68E	Local	5, 11, 17, 51, 56, 58	10
	Tandem	11	--
305 Q59-0568 568 MIAMFLOL68E	Local	5, 9, 17, 51, 56	56
	Tandem	--	5, 10
305 Q97-2336 336 MIAMFLOL68E	Local	5, 9, 10, 11, 14, 51, 56, 58	--
	Tandem	5, 9, 10, 11, 14, 58	--
904 Q85-5134 134 PNSCFLBLDS0	Local	4, 37, 44	7
	Tandem	4, 7, 21	4, 7, 21

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Categories 2 to 8

Rate Category	Q-Account/CLLI 561 Q59-0568 568 WPBHFLANDS0				561 Q85-5134 134 WPBHFLANDSO			
	Expected	Actual	Difference	% Diff	Expected	Actual	Difference	% Diff
Unbundled transport shared trans	39	50	11	28.21%	117	58	-59	-50.43%
Unbundled trans facilities term EO-EO	49	50	1	2.04%	76	81	5	6.58%
Unbundled trans facilities term EO-Tandem	9	10	1	11.11%	12	15	3	25.00%
Unbundled trans facilities term TOPS-EO	5	9	4	80.00%	23	17	-6	-26.09%
Unbundled trans tandem switch. FL-EC	62	60	-2	-3.23%	110	96	-14	-12.73%
Unbundled trans. tan. switch. Trunk Port	124	118	-6	-4.84%	220	193	-27	-12.27%
Unbundled local switching - Switch. Func	199	209	10	5.03%	351	315	-36	-10.26%
Unbundled local switching - Trunk Port	94	118	24	25.53%	124	194	70	56.45%

2nd AMENDED EXCEPTION 44
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	Expected	Actual	Difference	% Diff	Expected	Actual	Difference	% Diff
Unbundled transport shared trans	31	31	0	0.00%	42	22	-20	-47.62%
Unbundled trans facilities term EO-EO	25	58	33	132.00%	27	26	-1	-3.70%
Unbundled trans facilities term EO-Tandem	5	4	-1	-20.00%	5	7	2	40.00%
Unbundled trans facilities term TOPS-EO	6	6	0	0.00%	9	6	-3	-33.33%
Unbundled trans tandem switch. FL-EC	36	61	25	69.44%	40	34	-6	-15.00%
Unbundled trans. tan. switch. Trunk Port	69	124	55	79.71%	75	68	-7	-9.33%
Unbundled local switching - Switch. Func	156	211	55	35.26%	181	173	-8	-4.42%
Unbundled local switching - Trunk Port	65	124	59	90.77%	35	66	31	88.57%

2nd AMENDED EXCEPTION 44
BellSouth Florida OSS Testing Evaluation

Rate Category	Q-Account/CLLI 305 Q85-5134 134 MIAMFLOL68E				305 Q97-2336 336 MIAMFLOL68E			
	Expected	Actual	Difference	% Diff	Expected	Actual	Difference	% Diff
Unbundled transport shared trans	625	2	-623	-99.68%	131	0	-131	-100.00%
Unbundled trans facilities term EO-EO	102	2	-100	-98.04%	79	0	-79	-100.00%
Unbundled trans facilities term EO-Tandem	505	0	-505	-100.00%	11	0	-11	-100.00%
Unbundled trans facilities term TOPS-EO	13	0	-13	-100.00%	28	0	-28	-100.00%
Unbundled trans tandem switch. FL-EC	102	2	-100	-98.04%	175	57	-118	-67.43%
Unbundled trans. tan. switch. Trunk Port	204	4	-200	-98.04%	250	122	-128	-51.20%
Unbundled local switching - Switch. Func	764	58	-706	-92.41%	724	588	-136	-18.78%
Unbundled local switching - Trunk Port	39	4	-35	-89.74%	247	121	-126	-51.01%

2nd AMENDED EXCEPTION 44
 BellSouth Florida OSS Testing Evaluation

Rate Category	Q-Account/CLLI 904 Q85-5134 134 PNSCFBLDS0				904 Q85-5134 134 ORLDFLSADSO			
	Expected	Actual	Difference	%Diff	Expected	Actual	Difference	%Diff
Unbundled transport shared trans	56	78	22	39.29%	36	0	-36	-100.00%
Unbundled trans facilities term EO-EO	98	100	2	2.04%	0	0	0	0.00%
Unbundled trans facilities term EO-Tandem	25	22	-3	-12.00%	36	0	-36	100.00%
Unbundled trans facilities term TOPS-EO	0	0	0	0.00%	0	0	0	0.00%
Unbundled trans tandem switch. FL-EC	127	121	-6	-4.72%	36	0	-36	-100.00%
Unbundled trans. tan. switch. Trunk Port	220	221	1	0.45%	72	0	-72	-100.00%
Unbundled local switching - Switch. Func	434	500	66	15.21%	39	39	0	0.00%
Unbundled local switching - Trunk Port	98	220	122	124.49%	39	0	-39	-100.00%

Second Amendment

Following discussions between KPMG Consulting and BellSouth CABS billing Subject Matter Experts (SMEs), BellSouth provided new information with regard to how to calculate usage billing. The new information is shown below:

- 1 LRN is used to calculate mileages based on module 17B on the DUF record.
- 2 Directory assistance call completion events generate three DUF records, the directory assistance (DA) record, the DA call completion (DACC) record, and the record for the actual local or toll call resulting from the call completion: the DA and DACC portions are billed per event; the rate elements from the DACC call flow are only applicable to the local/toll record.
- 3 On alternately-billed calls, the billing account placement and rating is based on the originating telephone number – not the billed-to telephone number.

KPMG Consulting has recalculated expected mileage bands and expected billing by CLLI code based on the new information provided by BellSouth.

The results are presented below:

Category 1 – Mileage Band Summary

		Transport Mileage Band Breakdown	
		Expected	Actual
561 Q59-0568 568	Local	5, 7, 8, 10, 37, 38, 40, 41	5, 7, 8, 10, 11, 37, 40
WPBHFLANDS0	Tandem	0, 5, 11, 13, 41	5, 10, 11, 13
305 Q85-5134 134	Local	10, 17, 51, 56, #NA	10
MIAMFLOL68E	Tandem	0, 5, 10, 10, 21, 58, #NA	None
305 Q59-0568 568	Local	5, 56	56
MIAMFLOL68E	Tandem	0, 5, 10, #NA	5, 5, 5, 5, 10
904 Q85-5134 134	Local	--	--
ORLDFLSADS0	Tandem	--	--
305 Q97-2336 336	Local	5, 10, 11, 51, 56, 58	--
MIAMFLOL68E	Tandem	0, 5, 5, 9, 10, 11, 14, #NA	--
561 Q85-5134 134	Local	5, 8, 10, 11, 13, 37, 38, 40, 58	5, 8, 10, 11, 13, 37, 40
WPBHFLANDS0	Tandem	0, 5, 8, 11, 13, 52, #NA	5, 8, 10, 11, 13, 41
561 Q85-5134 134	Local	4, 5, 24, 27, 30	4, 5, 24, 27, 27
FTLDLFLMRDS0	Tandem	0, 5, 12, 17	5, 12, 13, 17
904 Q85-5134 134	Local	0, 0, 7, 7, 37, 44	7, 7
PNSCFLBLDS0	Tandem	00, 4, 7, 21, #NA, #NA	4, 4, 4, 7, 21

2nd AMENDED EXCEPTION 44
BellSouth Florida OSS Testing Evaluation

Categories 2 to 8 – Rate element quantities by CLLI code

Rate Category	Q-Account/CLLI 561 Q59-0568 568 WPBHFLANDSO				561 Q85-5134 134 WPBHFLANDSO			
	Expected	Actual	Difference	% Diff	Expected	Actual	Difference	% Diff
Unbundled transport shared trans	38	50	12	31.58 %	97	58	-39	-40.21%
Unbundled trans facilities term EO-EO	31	50	19	61.29%	68	81	13	19.12%
Unbundled trans facilities term EO-Tandem	7	10	3	42.86%	9	15	6	66.67%
Unbundled trans facilities term TOPS-EO	4	9	5	125.00%	13	17	4	30.77%
Unbundled trans tandem switch. FL-EC	41	60	19	46.34%	89	96	7	7.87%
Unbundled trans. tan. switch. Trunk Port	76	118	42	55.26%	169	193	24	14.20%
Unbundled local switching - Switch. Func	156	209	53	33.97%	295	315	20	6.78%
Unbundled local switching - Trunk Port	74	118	44	59.46%	169	194	25	14.79%

2nd AMENDED EXCEPTION 44
BellSouth Florida OSS Testing Evaluation

Q-Account/CLLI	561 Q85-5134 134 FTLDFLMRDSO				305 Q59-0568 568 MIAMFLOL68E			
Rate Category	Expected	Actual	Difference	% Diff	Expected	Actual	Difference	% Diff
Unbundled transport shared trans	63	31	32	50.79%	40	22	-18	-45%
Unbundled trans facilities term EO-EO	53	58	5	9.43%	27	26	-1	-3.70%
Unbundled trans facilities term EO-Tandem	5	4	-1	-20.00%	4	7	3	75%
Unbundled trans facilities term TOPS-EO	6	6	0	0.00%	6	6	0	0.00%
Unbundled trans tandem switch. FL-EC	58	61	3	5.17%	37	34	-3	-8.11%
Unbundled trans. tap. switch. Trunk Port	113	124	11	9.73%	70	68	-2	-2.86%
Unbundled local switching - Switch. Func	204	211	7	3.43%	169	173	4	2.37%
Unbundled local switching - Trunk Port	113	124	11	9.73%	69	66	-3	-4.35%

2nd AMENDED EXCEPTION 44
BellSouth Florida OSS Testing Evaluation

Rate Category	Q-Account/CLLI 305 Q85-5134 134 MIAMFLOL68E				305 Q97-2336 336 MIAMFLOL68E			
	Expected	Actual	Difference	% Diff	Expected	Actual	Difference	% Diff
Unbundled transport shared trans	114	2	-112	-98.25%	116	0	-116	-100.00%
Unbundled trans facilities term EO-EO	96	2	-94	-97.92%	88	0	-88	-100.00%
Unbundled trans facilities term EO-Tandem	4	0	-4	-100.00%	8	0	-8	-100.00%
Unbundled trans facilities term TOPS-EO	9	0	-9	-100.00%	22	0	-22	-100.00%
Unbundled trans tandem switch FL-EC	109	2	-107	-98.17%	116	57	-59	-50.86
Unbundled trans. tan. switch. Trunk Port	214	4	-210	-98.13%	225	122	-103	-45.78%
Unbundled local switching - Switch. Func	746	58	-688	-92.23%	693	588	-105	-15.15%
Unbundled local switching - Trunk Port	212	4	-208	-98.11%	225	121	-104	-46.22%

2nd AMENDED EXCEPTION 44
 BellSouth Florida OSS Testing Evaluation

Rate Category	Q-Account/CLLI - 904 Q85-5134 134 PNSCFBLDS0				904 Q85-5134 134 ORLDFLSADSO			
	Expected	Actual	Difference	% Diff	Expected	Actual	Difference	% Diff
Unbundled transport shared trans	140	78	-62	-44.29	36	0	-36	-100.00%
Unbundled trans facilities term EO-EO	115	100	-15	-13.04%	0	0	0	0.00%
Unbundled trans facilities term EO-Tandem	21	22	1	4.76%	36	0	-36	100.00%
Unbundled trans facilities term TOPS-EO	0	0	0	0.00%	0	0	0	0.00%
Unbundled trans tandem switch. FL-EC	123	121	-2	-1.63%	36	0	-36	-100.00%
Unbundled trans. tan. switch. Trunk Port	226	221	-5	-2.21%	72	0	-72	-100.00%
Unbundled local switching - Switch. Func	526	500	-26	-4.94%	39	39	0	0.00%
Unbundled local switching - Trunk Port	250	220	-30	-12.00%	75	0	-75	-100.00%

Impact:

A CLEC's ability to accurately project revenue and operating expenses is based, in part, on accurate billings from the ILEC. Incorrect billing can distort financial planning. In addition, incorrect charges on CLEC bills may cause a CLEC to incur added costs to reconcile bills and pursue bill corrections.

KPMG Consulting has further concluded that many of the discrepancies between the expected and actual results are due to the inadequacy of existing UNE-P usage billing documentation and the absence of specific documentation for DUF-to-billing reconciliation. Some examples of information that is not documented are as follows:

- Local routing number (LRN) is used to compute mileage on certain calls based on module 17B on category 10 records.
- Rate elements for directory assistance call completion events are only billed based on the local/toll call record using call flows in the Dx series, and not the typical call flows for local/toll calls: 1, 2, 3, 4, 5, 7. The directory assistance and call completion records are billed per-occurrence ("hit") and the individual rate elements do not apply.
- BellSouth has stated that not as many rate elements are billed for customer service calls as are currently documented.
- On alternately-billed calls the bill-to number does not drive the billing account (Q-Account). It is determined by the from-number. Records that are billed to a UNE-P line but neither originate nor terminate on a UNE-P number will not appear on a CABS bill. If a call originates or terminates (in the case of access calls) on a UNE-P line but bills to resale the call will show up on the CABS bill.
- When a credit is issued, the original call is billed as usual but the credit is not.

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 44



Florida OSS Test
Exception 44

May 3, 2001

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Carrier Functional Bill Evaluation (TVV11).

Exception:

BellSouth issued CABS bills which reflect incorrect quantities for Unbundled Switching and Transport usage.

Background:

In the course of executing the Functional Usage Evaluation (TVV11), KPMG Consulting completed a variety of test calls including calls on unbundled lines during the period between December 11-14, 2000. KPMG Consulting examined the corresponding December and January CABS bills and observed inconsistencies between the expected and actual results. The expected results were calculated using the Daily Usage Feed (DUF) records sent by Bellsouth-Florida.

Issue:

Bellsouth rendered bills to the KPMG Consulting CLEC with incorrect quantities of Unbundled Transport Shared Transport Access Tandem Originating minutes. Inconsistencies were observed in each of the following rate categories:

1. Unbundled transport shared transport
2. Unbundled transport facilities termination end-office (EO) to end-office
3. Unbundled transport facilities termination EO to Tandem
4. Unbundled transport facilities termination TOPS to EO
5. Unbundled transport tandem switching
6. Unbundled local switching – switching functionality

Category 1: Unbundled Transport Shared Transport

Inconsistencies in this category consisted of differences in the distribution of minutes across several mileage distances. Additionally, there were differences in the distances expected, based on KPMG Consulting calculations, and those actually reflected on the bills.

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 44

Categories 2 to 6

Inconsistencies in these categories consisted of differences in the expected number of minutes, as calculated by KPMG Consulting, and those reflected on the bill.

The following table provides examples of the discrepancies found in the different rate categories:

Rate Category	Q-Account/CLLI	561 Q85-5134 134 WPBHFLANDS0		904 Q85-5134 134 JCVLFLCLDS0		305 Q85-5134 134 MIAMFLOL68E	
		Expected	actual	Expected	actual	Expected	actual
local originating		1116	38	42	35	298	214
tandem originating		192	92	167	16	84	23
access tandem originating		n/a	n/a	n/a	n/a	233	12
access tandem terminating		n/a	n/a	n/a	n/a	11	1
Unbundled transport shared trans		1308	130	209	51	626	250
local originating		1116	38	42	32	297	210
tandem originating		155	208	141	184	47	61
Unbundled trans facilities term EO-EO		1271	246	183	216	344	271
local tandem originating		17	16	10	10	6	15
access tandem originating		n/a	n/a	6	6	12	12
access tandem terminating		n/a	n/a	0	77	0	1
Unbundled trans facilities term EO-Tandem		17	16	16	93	18	28
local tandem originating		24	42	18	58	32	29
Unbundled trans facilities term TOPS-EO		24	42	18	58	32	29
local originating		1116	38	42	32	297	210
tandem originating		201	224	167	194	84	76
access tandem originating		n/a	n/a	6	6	12	12
access tandem terminating		n/a	n/a	0	77	0	1
Unbundled trans tandem switching		1317	262	215	309	393	299
local originating intraswitch		3724	3708	3202	3138	3627	3619
local originating interswitch		244	262	166	230	79	285
TEO interswitch		1206	288	163	274	379	201
access originating interswitch		175	180	202	524	233	234
terminating interswitch		3	90	0	149	11	82
Unbundled local switching		5352	4528	3569	4316	4329	4521

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 44

Impact:

A CLEC's ability to accurately project revenue and operating expenses is based, in part, on accurate billings from the ILEC. Incorrect billing can distort financial planning. In addition, incorrect charges on CLEC bills may cause a CLEC to incur added costs to reconcile bills and pursue bill corrections.

BellSouth Response:

BellSouth identified four scenarios that attributed to the differences in the expected and actual number of minutes of use that were observed in the rate elements in categories 1 – 6 listed above. The scenarios are described as follows:

1. Custom Local Area Signaling Services, such as Touch Star services, are not billable records for UNE usage rate elements as defined by BellSouth. However, DUF records are sent to the CLEC for their billing purposes.
2. Intralata toll calls LPIC'd to BellSouth were originally considered un-billable. A mechanical billing method for applying UNE usage to BellSouth carried Intralata toll messages will be in place by June 5, 2001. DUF records are sent to the CLEC for their billing purposes, however.
3. Usage sensitive calls, such as 3-way calling, are not billable records for UNE usage rate elements as defined by BellSouth. However, DUF records are sent to the CLEC for their billing purposes.
4. Alternately billed non-UNE originated or terminated calls, such as third number and credit card calls, are not billable records for UNE usage rate elements as defined by BellSouth. However, DUF records are sent to the CLEC for their billing purposes.

FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO EXCEPTION 44



Florida OSS Test
Exception 44

May 10, 2001

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Carrier Functional Bill Evaluation (TVV11).

Exception:

BellSouth issued CABS bills which reflect incorrect quantities for Unbundled Switching and Transport usage.

Background:

In the course of executing the Functional Usage Evaluation (TVV11), KPMG Consulting completed a variety of test calls including calls on unbundled lines during the period between December 11-14, 2000. KPMG Consulting examined the corresponding December and January CABS bills and observed inconsistencies between the expected and actual results. The expected results were calculated using the Daily Usage Feed (DUF) records sent by Bellsouth-Florida.

Issue:

Bellsouth rendered bills to the KPMG Consulting CLEC with incorrect quantities of Unbundled Transport Shared Transport Access Tandem Originating minutes. Inconsistencies were observed in each of the following rate categories:

1. Unbundled transport shared transport
2. Unbundled transport facilities termination end-office (EO) to end-office
3. Unbundled transport facilities termination EO to Tandem
4. Unbundled transport facilities termination TOPS to EO
5. Unbundled transport tandem switching
6. Unbundled local switching – switching functionality

Category 1: Unbundled Transport Shared Transport

Inconsistencies in this category consisted of differences in the distribution of minutes across several mileage distances. Additionally, there were differences in the distances expected, based on KPMG Consulting calculations, and those actually reflected on the bills.

FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO EXCEPTION 44

Categories 2 to 6

Inconsistencies in these categories consisted of differences in the expected number of minutes, as calculated by KPMG Consulting, and those reflected on the bill.

The following table provides examples of the discrepancies found in the different rate categories:

Rate Category	Q-Account/CLL	561 Q85-5134 134 WPBHFLANDS0		904 Q85-5134 134 JCVLFLCLDS0		305 Q85-5134 134 MIAMFLOL68E	
		Expected	actual	Expected	actual	Expected	actual
local originating		1116	38	42	35	298	214
tandem originating		192	92	167	16	84	23
access tandem originating		n/a	n/a	n/a	n/a	233	12
access tandem terminating		n/a	n/a	n/a	n/a	11	1
Unbundled transport shared trans		1308	130	209	51	626	250
local originating		1116	38	42	32	297	210
tandem originating		155	208	141	184	47	61
Unbundled trans facilities term EO-EO		1271	246	183	216	344	271
local tandem originating		17	16	10	10	6	15
access tandem originating		n/a	n/a	6	6	12	12
access tandem terminating		n/a	n/a	0	77	0	1
Unbundled trans facilities term EO-Tandem		17	16	16	93	18	28
local tandem originating		24	42	18	58	32	29
Unbundled trans facilities term TOPS-EO		24	42	18	58	32	29
local originating		1116	38	42	32	297	210
tandem originating		201	224	167	194	84	76
access tandem originating		n/a	n/a	6	6	12	12
access tandem terminating		n/a	n/a	0	77	0	1
Unbundled trans tandem switching		1317	262	215	309	393	299
local originating intraswitch		3724	3708	3202	3138	3627	3619
local originating interswitch		244	262	166	230	79	285
TEO interswitch		1206	288	163	274	379	201
access originating interswitch		175	180	202	524	233	234
terminating interswitch		3	90	0	149	11	82
Unbundled local switching		5352	4528	3569	4316	4329	4521

FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO EXCEPTION 44

Impact:

A CLEC's ability to accurately project revenue and operating expenses is based, in part, on accurate billings from the ILEC. Incorrect billing can distort financial planning. In addition, incorrect charges on CLEC bills may cause a CLEC to incur added costs to reconcile bills and pursue bill corrections.

Amended BellSouth Response:

BellSouth identified four scenarios that attributed to the differences in the expected and actual number of minutes of use that were observed in the rate elements in categories 1 – 6 listed above. The scenarios are described as follows:

1. Custom Local Area Signaling Services, such as Touch Star services, are not billable records for UNE usage rate elements as defined by BellSouth. However, DUF records are sent to the CLEC for their billing purposes.
2. Intralata toll calls LPIC'd to BellSouth were originally considered un-billable. A mechanical billing method for applying UNE usage to BellSouth carried Intralata toll messages will be implemented May 25, 2001. DUF records are sent to the CLEC for their billing purposes, however.
3. Usage sensitive calls, such as 3-way calling, are not billable records for UNE usage rate elements as defined by BellSouth. However, DUF records are sent to the CLEC for their billing purposes.
4. Alternately billed non-UNE originated or terminated calls, such as third number and credit card calls, are not billable records for UNE usage rate elements as defined by BellSouth. However, DUF records are sent to the CLEC for their billing purposes.